

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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WILLIE VARGAS,

Plaintiff,

**COMPLAINT**

-against-

Jury Demand

THE CITY OF NEW YORK,  
JOHN DOE 1, JOHN DOE 2,  
DETECTIVE RON DAZZLE,

Defendants.  
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Plaintiff Willie Vargas ("Plaintiff") by and through his attorney Vik Pawar, Esq., respectfully alleges as follows:

1. Plaintiff brings this action for compensatory damages, punitive damages and attorney's fees for violations of their civil rights, as secured by statutes and the Constitution of the United States and the State of New York.

**PARTIES**

2. Plaintiff is a citizen of the United States, and at all relevant times a resident of the County of Kings, and CITY and State of New York.

3. Defendant CITY of New York (hereinafter "CITY") was and is a municipal corporation duly organized and existing under and by virtue of the laws of the State of New York.

4. The individual Doe and named defendants are employees of the NYPD which is a non-suable entity.

**FACTS**

5. On July December 9, 2022, at approximately 1 a.m., plaintiff was pulled over by John Doe and John Doe 2 from the 94<sup>th</sup> precinct.

6. Plaintiff was taken to the precinct and then to Central Booking.

7. After he was released from Central Booking without any charges lodged against him, he was re-arrested and then transported to the 107<sup>th</sup> precinct.

8. At the precinct, defendant Dazzle told him to contact Dazzle after the holidays and plaintiff was released.

9. Plaintiff was not told the reason behind his arrest and detention and he spent approximately 24 hours in unlawful detention.

10. On December 29, 2022, plaintiff's ordeal from earlier in the month was once again repeated.

11. Plaintiff was arrested by the same two officers, taken to the precinct, then to central booking, then to the 107<sup>th</sup> precinct and then this time to Queens Central Booking where he was let go without any charges brought against him.

12. This time, plaintiff spent approximately 30 hours in detention.

13. The three defendants continued to press plaintiff to admit that he had a weapon in his car on both occasions to justify their seizure of plaintiff but plaintiff refused to do so.

**AS AND FOR A FIRST CAUSE OF ACTION**

(Fourth and Fourteenth Amendments- unlawful seizure/excessive force)

14. Plaintiff repeats, reiterates and realleges each and every allegation contained in the foregoing paragraphs as if fully set forth herein.

15. Defendants used force and brute to arrest Plaintiff and physically assaulted him. Defendants after pressuring plaintiff by using physical force finally admitted they were just looking for information on guns and they had no charges to hold plaintiff in custody.

16. These defendants also trumped up charges against Plaintiff and fabricated evidence in order to justify their unlawful seizure of plaintiff.

17. As a result of defendants' collective conduct, plaintiff was unlawfully seized and arrested.

**AS AND FOR A SECOND CAUSE OF ACTION**  
(*Monell* liability)

18. Plaintiff repeats, reiterates and realleges each and every allegation contained in the foregoing paragraphs as if fully set forth herein.

19. Defendant City through the NYPD routinely stops individuals who are of minority background.

20. The NYPD officers then put pressure on these individual for information about guns and weapons.

21. The City knows through the NYPD that the detained individuals had done nothing wrong but nevertheless continue the detention for improper purposes all the while threatening the detained individuals such as plaintiff with arrests and false charges.

22. This practice by the City through the NYPD is the direct causal connection between the injury suffered by plaintiff and the practices employed by the NYPD.

**WHEREFORE**, Plaintiff seeks compensatory damages in form of judgment against the defendant individually, jointly, severally in the amount of \$250,000.00 for each and every cause of action, punitive damages to be determined by the jury, costs, expenses and attorney fees, and any other relief that the Court may deem just and proper.

**Dated:** January 9, 2023  
New York, New York 10007



Respectfully

Vik Pawar  
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